

COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy

**RESPONSE OF THE ATTORNEY GENERAL TO THE
FIRST SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
D.T.E. 05-27**

Dated: August 1, 2005

Responsible Party: David Effron.

BSG-AG-1-4 Please refer to the Effron Testimony at page 11, lines 1-2. Please provide empirical support, including all studies conducted by Mr. Effron or known to him (including workpapers and associated source documents) related to his proposed reduction to the Company's authorized return related to the PPM.

Response: Mr. Effron has not conducted any studies related to his testimony that there should be a reduction to the Company's authorized return related to the PPM.